

NORWICH TO TILBURY

EN020027

Comments on Submissions received at Deadline 7

Suffolk County Council [REDACTED]

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Glossary of Acronyms

<i>AMS-OWSI</i>	<i>Archaeological Mitigation Strategy and Outline Written Scheme of Investigation</i>
<i>CoCP</i>	<i>Code of Construction Practice</i>
<i>DCO</i>	<i>Development Consent Order</i>
<i>LIR</i>	<i>Local Impact Report</i>
<i>LPA</i>	<i>Local Planning Authority</i>
<i>NSIP</i>	<i>Nationally Significant Infrastructure Project</i>
<i>PPA</i>	<i>Planning Performance Agreement</i>

SCCAS *Suffolk County Council Archaeological Service*

“BDC” refers to Babergh District Council; “MSDC” refers to Mid Suffolk District Council; “BMSDC” refers to BDC and MSDC jointly; “SCC” refers to Suffolk County Council; and “the Councils” refers to BDC, MSDC, and SCC jointly.

Purpose of this Submission

The document has been prepared by Suffolk County Council to respond to the Applicant’s submissions, and where appropriate representations made by other interested parties, received at Deadline 7 (“**D7**”) for Norwich to Tilbury. Examination Library references are used throughout to assist readers.

Comments on submissions received at Deadline 7

Table 1: 2.16 (C) Trees and Hedgerows to be Removed and or Managed Plans - Section B [REP7-051]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
1.1	Landscape	General	The trees and hedgerows to be removed remain unidentified, except for trees under Tree Preservation Orders. No reference is provided on the drawings as to where information that would enable identification is provided, such as baseline Arboricultural and Hedgerow Surveys and their associated schedules. Even in document 7.4 Outline Landscape and Ecological Management Plan Appendix A - Arboricultural Impacts Plan (Clean) (Final Issue C) [REP7-344], not all trees and no hedges (including those that would be affected by the proposals) are identified. This lack of transparency is unacceptable and needs to be addressed prior to detailed design.

Table 2: 2.16 (C) Trees and Hedgerows to be Removed and or Managed Plans - Section C [REP7-053]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
2.1	Landscape	General	The trees and hedgerows to be removed remain unidentified, except for trees under Tree Preservation Orders. No reference is provided on the drawings as to where information that would enable identification is provided, such as baseline Arboricultural and Hedgerow Surveys and their associated schedules. Even in document 7.4 Outline Landscape and Ecological Management Plan Appendix A - Arboricultural Impacts Plan (Clean) (Final Issue C) [REP7-344], not all trees and no hedges (including those that would be affected by the proposals) are identified. This lack of transparency is unacceptable and needs to be addressed prior to detailed design.

Table 3: 3.1 (G) Draft DCO [REP7-065]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
3.1	Archaeology	Article 23 (Removal of human remains)	Article 23 is not appropriate for the treatment of archaeological human remains and was designed to facilitate the exhumation of burials from modern burial grounds. There is no evidence that modern burial grounds, in Suffolk, would be impacted by the Proposed Development. SCCAS therefore recommend that Article 23 is removed.
3.2	Archaeology	5. Archaeology Requirement 5(1) <i>"(1) No archaeological evaluation works may begin until a written scheme of investigation for those archaeological evaluation works has been submitted to, and approved by, the relevant planning authority following consultation with the relevant county planning authority's archaeological or historic environment service and, if relevant, Historic England."</i>	Requirement 5(1) currently refers to "<i>No archaeological evaluation...</i>". This is not sufficient, as the requirement needs to control commencement of the authorised development itself to be enforceable. As drafted, there is a potential scenario in which construction, site preparation or other archaeologically damaging activities could commence before archaeological evaluation, and any necessary mitigation have been carried out. Part 1 should therefore be amended so that no stage of the authorised development may commence, including pre-commencement operations involving intrusive groundworks, until an appropriate detailed Written Scheme of Investigation for archaeological evaluation has been submitted to and approved. SCCAS suggested wording: <u>"(1) No stage of the authorised development may commence, including any pre-commencement operations that involve intrusive groundworks, which for the avoidance of doubt includes vegetation removal where that removal involves intrusive groundworks, until a detailed</u> Written Scheme of Investigation for archaeological evaluation works for that stage or relevant part

			<i>of the authorised development has been submitted to and approved by the relevant planning authority, following consultation with the relevant county planning authority's archaeological or historic environment service and, if relevant, Historic England."</i>
3.3	Archaeology	Requirement 5(2) <i>"(2) Before any detailed written scheme of investigation (excluding any written scheme of investigation required under paragraph (1)) is submitted for approval under paragraph (3), the undertaker must carry out archaeological evaluation works in accordance with the written scheme of investigation approved under paragraph (1), unless otherwise agreed with the relevant planning authority following consultation with the relevant county planning authority's archaeological or historic environment service and, if relevant, Historic England."</i>	If part 1 can be amended to the SCCAS suggested wording, part 2 as worded by the Applicant would be acceptable with a minor amendment to allow the submission of the evaluation reports to the discharging authority to enable the discharge of the requirement 5(2). <u>SCCAS suggested wording:</u> <i>"(2) Before any detailed written scheme of investigation (excluding any written scheme of investigation required under paragraph (1)) is submitted for approval under paragraph (3), the undertaker must carry out archaeological evaluation works in accordance with the written scheme of investigation approved under paragraph (1), <u>and submit the reports generated by this work to the Local Planning Authority as proof of delivery.</u> unless otherwise agreed with the relevant planning authority following consultation with the relevant county planning authority's archaeological or historic environment service and, if relevant, Historic England."</i>
3.4	Archaeology	Requirement 5(3) <i>"(3) No stage of the authorised development may commence until detailed written schemes of investigation of areas of archaeological interest relevant to that stage (if any), which may include a preservation in</i>	Part 3 as currently written is unclear and should also be amended to include pre-commencement operations involving intrusive groundworks. It should secure the subsequent mitigation strategy, whether preservation in situ or preservation by record, and ensure that this is informed by the archaeological evaluation carried out under Part 1 and by the archaeological evaluation that has been completed prior to submission.

		<i>situ management plan if relevant, as identified within the outline archaeological mitigation strategy and outline written scheme of investigation or identified through evaluation work as set out in the outline archaeological mitigation strategy and outline written scheme of investigation, has been submitted to and approved by the relevant planning authority following consultation with the relevant county planning authority's archaeological or historic environment service and, if relevant, Historic England."</i>	<u>SCCAS suggested wording:</u> <u>"(3) No stage of the authorised development may commence, including any pre-commencement operations that involve intrusive groundworks which for the avoidance of doubt, includes any vegetation removal, where this removal includes intrusive groundworks until for that stage either a preservation in situ Management Plan or a detailed written scheme of investigation, which accords with the Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation and is informed by the pre-commencement archaeological evaluation under part (1) and the works that have been completed prior to submission, has been submitted to and approved by the relevant planning authority, in consultation with the relevant county planning authority's archaeological or historic environment service and, if relevant Historic England. All archaeological works must be carried out in accordance with the approved detailed written scheme of investigation for that stage."</u> Parts 1, 2 and 3 with the amendments suggested by SCCAS would provide a clear process for archaeological evaluation and subsequent mitigation and provide clear points for the discharging authority to discharge the requirements.
3.5	Archaeology	Requirement 5(4) <i>"(4) Any detailed archaeological works must be carried out in accordance with the approved detailed written scheme of investigation for that stage."</i>	This requirement can be removed if added into requirement 5(3) as it is an informative rather than something that can be discharged on its own.
3.6	Archaeology	Requirement 5(5)	This requirement is acceptable.

		<i>“(5) Each detailed written scheme of investigation must be substantially in accordance with the outline archaeological mitigation strategy and outline written scheme of investigation and must identify areas where archaeological works are required and the measures to be taken to protect, record or preserve any significant archaeological remains that may be found and must include—</i> <i>(a) an assessment of significance and research questions;</i> <i>(b) the programme and methodology of site investigation and reporting;</i> <i>(c) the programme for post-investigation assessment;</i> <i>(d) proposals for providing for the analysis of site investigation and recording;</i> <i>(e) proposals for providing archive deposition of the analysis and records of the site investigation;</i> <i>(f) nomination of a competent person or persons/organisation to undertake the</i>	
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		works set out within the detailed written scheme of investigation; and <i>(g) an implementation timetable.”</i>	
3.7	Archaeology	Requirement 5(6) <i>“(6) Unless otherwise agreed with the relevant planning authority—</i> <i>(a) no later than one year following the completion of the fieldwork specified in each detailed written scheme of investigation, a site-specific post excavation assessment for that site must be completed in accordance with the detailed written scheme of investigation and submitted to the relevant planning authority for approval;</i> <i>(b) no later than one year following the approval of the final site-specific post excavation assessment, an archaeological updated project design must be submitted to, and approved by, the relevant planning authority following consultation with the county planning authority’s archaeological or historic environment service or, if relevant, Historic England and the archaeological updated project design</i>	This requirement is acceptable.

		<i>must be in general accordance with the outline archaeological mitigation strategy and outline written schemes of investigation and set out scope for full post-excavation analysis and publication and have regard to the site-specific research agendas set out in the detailed written schemes of investigation;</i> <i>(c) post-excavation analysis and publication must be carried out in accordance with the approved archaeological updated project design;</i> <i>(d) the full archaeological archive, both physical and digital, must be deposited to the relevant archaeological archive repository for the relevant county in accordance with the approved archaeological updated project design.”</i>	
3.8	Archaeology	Requirement 5(7) <i>“(7) All pre-commencement operations must be carried out in accordance with the outline archaeological mitigation strategy and outline written scheme of investigation, and any pre-commencement operations comprising</i>	If parts 1, 2 and 3 are amended as SCCAS have suggested, then SCCAS would recommend the following amendment to requirement 5(7) to facilitate the undertaking of archaeological mitigation during the pre-commencement period. <i>“(7) Any pre-commencement operations <u>comprising archaeological mitigation</u> must be carried out in accordance with the outline archaeological mitigation strategy and outline written scheme of investigation, and must be</i>

		<i>archaeological mitigation must be carried out in accordance with the detailed written schemes of investigation for mitigation areas, unless otherwise agreed with the relevant planning authority following consultation with the relevant county planning authority's archaeological or historic environment service and, if relevant, Historic England."</i>	<i>carried out in accordance with the detailed written schemes of investigation for mitigation areas, unless otherwise agreed with the relevant planning authority following consultation with the relevant county planning authority's archaeological or historic environment service and, if relevant, Historic England."</i>
3.9	Skills, education and employment	Requirement 15 <i>The authorised development may not commence until an employment and skills plan (which must be substantially in accordance with the outline employment and skills plan) has been submitted to and approved by the relevant county planning authority and Thurrock Council. (2) The authorised development must be carried out in general accordance with any employment and skills plan submitted approved further to sub-paragraph (1) unless otherwise agreed with the relevant county planning authority and Thurrock Council</i>	SCC welcomes the amendment to Requirement 15 requiring the Employment and Skills Plan ("ESP") to be "submitted to and approved by" the relevant county planning authority and Thurrock Council prior to commencement. This amendment addresses a key concern previously raised by SCC and represents a significant improvement to the drafting of the Requirement. SCC considers that securing approval of the Final ESP provides an appropriate mechanism to ensure that the document is subject to review and scrutiny before implementation and that it contains sufficient detail regarding workforce, skills and supply chain matters to support delivery of its objectives. Accordingly, SCC welcomes the inclusion of the approval requirement and considers that it provides greater certainty, accountability and oversight than the previous drafting, which required submission only. SCC therefore supports this amendment to Requirement 15.

Table 4: 3.5 (F) Schedule of Changes to the Draft DCO [REP7-070]			
Ref.	dDCO ref.	Change Made	SCC's Comments
Table 2.6 (Schedule of Changes to Version F of the draft DCO [REP6-030]) of the Applicant's deadline 7 document Schedule of Changes to the Draft DCO [REP7-070] sets out the main changes made by the Applicant to the draft DCO and which are included in deadline 7 draft DCO [REP7-065]. This table sets out SCC's comments on certain of those changes. For convenience, SCC has retained the Applicant's reference numbering.			
24.	Art.12(2)(e) (application of the permit schemes)	<u>(e) where the undertaker submits an application for a permit in relation to the construction or maintenance of the authorised development and the relevant highway authority fails to communicate its decision on that application within the lesser of—</u> <u>(i) such period as the permit scheme provides for the communication of the decision in question; or</u> <u>(ii) 20 business days of receiving the application,</u> <u>(or such other period as may be agreed in writing between the relevant highway authority and the undertaker), the relevant highway authority is deemed to have granted the permit on the terms applied for; and</u>	Deeming provision Sub-paragraph (e) should be deleted. There should be no deeming provision in the circumstances described because a proposal which the relevant highway authority considered unsafe could end up being consented based on the deeming provision. That is unreasonable and potentially dangerous. It is noted this deeming provision is not accompanied by the drafting which is used elsewhere in respect of

			deeming provisions and which (i) requires the applicant, when applying for a consent, to notify the authority of the deeming provision and (ii) states that if such notification is not given, the deeming provision will not apply. (See, for example, article 11(4) and (5)). If the Secretary of State disagrees with SCC's view that sub-paragraph (e) should be deleted, SCC considers the drafting should be amended to include equivalent provisions to sub-paragraphs (4) and (5) of article 11. In addition, the timescale in art.12(2)(e)(ii) should be consistent with the timescales used elsewhere in the dDCO (and particularly in Part 3 (streets) i.e. "25 business
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			days (or such other period as agreed by the relevant highway authority and the undertaker)". See, for example, the following provisions which all refer to "25 business days (or such other period as agreed by the relevant [x] authority and the undertaker": articles 11(3) (street works), 14(5) (power to alter layout, etc. of streets), 16(8) (temporary closure of streets and public rights of way), 17(2) (access to works), 20(9) (discharge of water), 22(8) (authority to survey and investigate the land), 49(10) (traffic regulation), and 50(5) (felling or lopping). It will be remembered that SCC considers the 25 business day timescale is too short and should be replaced throughout the dDCO with 40 business
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			days. This applies equally to art. 12(2)(e)(ii).
24.	Art.12(2)(f) (application of the permit schemes)	<u>(f) where there is any inconsistency between the terms of any permit scheme and this Order regarding the timescales within which a relevant highway authority must communicate its decision on any application for a permit made pursuant to a permit scheme in connection with the authorised development—</u> <u>(i) the timescales set out in this Order take precedence over any conflicting timescale under the permit scheme; and</u> <u>(ii) any deemed consent provision under this Order continues to apply notwithstanding any differing provision in the permit scheme,</u> <u>unless otherwise agreed in writing between the relevant highway authority and the undertaker.</u>	Sub-paragraph (f) should be omitted because where there is a conflict between the permit scheme and the Order, the terms of the scheme should take prevail.
25.	Art.13 (application of the 1991 Act)	(6) The provisions of the 1991 Act referred to in paragraph (5) are— (a) section 54 (advance notice of certain works), subject to paragraph (7); (b) section 55 (notice of starting date of works), subject to paragraph (7); (c) section 57 (notice of emergency works); (d) section 59 (general duty of street authority to co-ordinate works); (e) section 60 (general duty of undertakers to co-operate); (f) section 68 (facilities to be afforded to street authority); (g) section 69 (works likely to affect other apparatus in the street); (h) section 71 (materials, workmanship and standard of reinstatement); (i) section 75 (inspection fees);	Sub-paragraph (6)(i) has been included in every version of the dDCO since the application version [APP-056] . SCC is surprised that the Applicant proposes, at this very late stage, to delete it. The provision should be included on the basis of fairness: if works are inspected, a fee should be paid for that inspection. There is no reasonable basis why the Applicant should not cover the cost of work done by the

			highway authority as a result of the Applicant's project. If the Applicant does not pay the fee, the inspection cost will fall on the public purse and there is no reasonable basis for that.
57. to 59.	Schedule 3, Requirements (paragraph 5) (archaeology)	Rows 57 to 59 set out the Applicant's amendments to requirement 5 (archaeology).	SCC's concerns regarding the drafting of requirement 5 have been included in several Examination documents, including: [REP1-178]: paras 14.48 to 14.57, [REP2-040] (para 5.13), [REP3-086] (response to DCO 1.S8), [REP4-335], Table 2: 3.1, (row 2.7), [REP6-166] (item 5.2a), and [REP6-167] Table 1 (item 1.1 (archaeology)). SCC maintains its concerns despite the latest amendments. SCC's preferred drafting for this

			requirement is included in [REP6-167]. SCC's preferred form of requirement 5 is included in SCC's Closing Statement, submitted at this deadline (deadline 8).
121.	Schedule 16 (protective provisions) Part 4 – for the protection of the highway authorities	Part 4 of Schedule 16 sets out an updated set of highways protective provisions.	SCC's preferred form of these protective provisions is included in [REP7-572].
150.	Schedule 20 (landscape compensation offsetting and enhancement in relation to specified locations) – footnote (a).	<u>(a) [The Applicant does not consider that the applicable legal and National Policy Statement ("NPS") policy framework requires the provision of compensation, offsetting or enhancement for the residual landscape and visual effects of the authorised development. The Applicant set out its position to the Examining Authority at Issue Specific Hearing 4 and summarised this at paragraph 5.1(a) of 8.5.12 Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]. Without prejudice to that position, the Applicant has progressed consideration of landscape compensation, offsetting and enhancement proposals with the relevant local authorities at certain locations as specified in Schedule [20] of this draft Order, given effect by this Article [63]. This Article [63] and Schedule [20] are therefore proposed on a "blue pencil" basis as a matter for the Secretary of State to determine whether they are required pursuant to the applicable legal and NPS policy framework. If the Secretary of State agrees with the Applicant's position and concludes the contributions to be paid pursuant to Article [63] and Schedule [20] are not required by the applicable legal and NPS policy framework, the Applicant requests that Article [63] and Schedule [20] be deleted from the final form Order if it is made. Alternatively, if the Secretary concludes that the proposed Article is in accordance with the legal and policy framework, Article [63] and Schedule [20] should be retained in the Order and the square brackets removed. In either event, this footnote should be removed in any final made Order.]</u>	Schedule 20 (and article 63 (landscape compensation, offsetting and enhancement)) have been included by the Applicant on the basis of a "blue pencil" test. It will be remembered that SCC, together with Norfolk CC, Essex CC and Thurrock Council, requested that the Applicant enter into a

			section 106 agreement to cover this topic. The Applicant refused. Footnote (a) sets out the Applicant's position in respect of that test. The authorities disagree with that position. The relevant legal and policy tests are met and Schedule 20 (and article 63) ought to be included in the DCO. During the examination, the authorities have provided robust justification to support the inclusion of a regime for landscape compensation, offsetting, and enhancement in relation to specified locations within their administrative areas. For example – <u>Suffolk County Council:</u> [RR-3520] (92-112), [REP1-178] (13.220-225), [REP3-085] (5.2-5), [REP4-335]
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			(9.24), [REP4-336] (8.2-3), [REP5-271] (GEN2.2 and LV2.16), and [REP6-166] (5.1.a); <u>Essex County Council:</u> [REP1-161] (4.10.4-7), [REP3-077] (3.22-25), [REP4-328] (5.20-26), [REP5-242] (LV2.16), and [REP6-147] (3.1-8); <u>Norfolk County Council:</u> [RR-2754] (10-19-21), [REP1-173] (11.24-30), [REP5-256] (GEN2.2); and <u>Thurrock Council:</u> [REP6-170] (2.3). Subject to the proposed minor amendments (below) to paragraphs 1(1) and 7(1), SCC is content with Schedule 20 as drafted and considers it should be included in the made DCO. (Norfolk CC, Essex CC and Thurrock Council are also content with these amendments).
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150.	Schedule 20 (landscape compensation offsetting and enhancement in relation to specified locations) – paragraph 1(1).	<u>“relevant authority” means the authority specified in column 2 of the table in paragraph 2 (in its capacity as local planning authority) for the landscape compensation, offsetting and enhancement area specified in column 1 of that table; and any reference in this Schedule to a named relevant authority includes any successor body exercising its functions as local planning authority;</u>	The words “(in its capacity as local planning authority)” should be omitted. SCC would not be operating under this Schedule in its capacity as minerals and waste (planning) authority. The inclusion of the words risks causing confusion in this regard and so they should be omitted.
150.	Schedule 20 (landscape compensation offsetting and enhancement in relation to specified locations) – paragraph 7(1).	<u>7. —(1) Where, on the ten-year date, any part of a contribution (including interest accrued in the account) remains unspent or uncommitted, the relevant authority must, either—</u>	The following amendment should be made for clarity and certainty – “Where, on the ten-year date, any part of a contribution (including interest accrued in the account in respect of it) remains unspent or uncommitted, the relevant authority must, either—”

Table 5: 5.9.2 (E) Signed Statement of Common Ground - Suffolk County Council (SCC) (incl LLFA and Highways) [REP7-096]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
5.1	Health and Wellbeing	ID 3.5.3 EIA – Data sources	The issues identified in the following text has since been agreed: <i>“Section 10.4 and 7.4 - there is no data detailed in either Section Neither the Place Based Needs assessment (PBNA), Suffolk Office of Data & Analytics (SODA) nor the Suffolk Joint Strategic Needs Assessment (JSNA) are considered (e.g. no mention in Table 10.1). The JSNA is referred to in the Bibliography only.”</i> Furthermore, the status is incorrectly marked as Agreed, despite the Applicants text stating <i>“The Applicant recognises that a mutually agreed position has not been reached, and therefore the matter is recorded as Not Agreed”</i>. SCC (Public Health) suggest the matter is “partially agreed”.
5.2	Health and Wellbeing	ID 3.5.4 Assessment Methodology	It is suggested that SCC position comments can be extended to close with <i>“SCC are satisfied that Chapter 10 has been sufficiently amended”</i>.
5.3	Skills, education and employment	ID 3.13.13 Employment and skills plan	SCC notes that SoCG matter 3.13.13 (Employment and Skills Plan) has been superseded by subsequent amendments to Requirement 15. SCC welcomes the amendment requiring approval of the Employment and Skills Plan by the relevant county planning authority and Thurrock Council, which addresses one of SCC's principal concerns in relation to the drafting of the Requirement. However, SCC notes that its wider concerns regarding the Outline Employment and Skills Plan remain unresolved. These concerns relate to the adequacy of the workforce evidence base, the assessment of cumulative labour market and supply chain impacts, integration with the Regional Skills Coordination

			Function (“ RSCF ”), governance arrangements, and the absence of clearly defined targets, monitoring arrangements and delivery mechanisms. SCC's position on these matters is set out in its Rule 17 and subsequent Examination submissions.
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Table 6: 7.2 (G) Outline Code of Construction Practice [REP7-323]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
6.1	Water Environment	Table 6.1 Mitigation measures / environmental commitments Commitment W23 <i>“Where construction works are undertaken in proximity to watercourses with high sensitivity to water quality changes, regular visual monitoring for signs of water pollution would be undertaken by the Environmental Clerk of Works (ECoW), in particular during periods of heavy rainfall. If signs of water pollution are detected the ECoW would use in-situ handheld devices to record key parameters and if pollution is confirmed, appropriate mitigation measures should be implemented to prevent further deterioration.”</i>	The acronym ECoW (Ecology Clerk of Works) is used here where it should read EnvCoW (Environment Clerk of Works).
6.2	Landscape/Biodiversity	7.3 Ecology and Landscape Working Group <i>“[...] The Ecology and Landscape Working Group would include the Ecological Clerk of Works and suitably</i>	Direct reference to ECoW being included within the Ecology and Landscape Working Group is made. Given the recent inclusion of Landscape into the group, should the LCoW not also be included in this group and report accordingly?

		<i>qualified and experienced members from the Local Planning Authorities, Wildlife Trust(s) and Natural England on their request and agreement with National Grid. [...]</i>	
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Table 7: 7.4 (G) Outline Landscape and Ecological Management Plan [REP7-343]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
7.1	Landscape	7.5.13, 7.5.15 et al <i>“A total of 112 veteran trees and four veteran tree groups have been identified within the Study Area, of which 111 veteran trees and all veteran tree groups will be retained with appropriate mitigation measures in place. One veteran tree requires removal and 17 veteran trees and two veteran groups require crown management to facilitate construction of the Project. [...]</i> <i>One veteran tree requires removal, while 17 veteran trees and two veteran groups require crown management to facilitate construction of the Project.”</i>	SCC welcomes that it was possible to avoid crown management on two veteran tree groups.
7.2	Landscape	7.6.4 <i>“In accordance with good practice measures, a full record of the condition of hedgerows will be carried out (photographic and</i>	SCC welcomes that the hedgerow condition record will be shared with the relevant local authorities.

		<i>descriptive) prior to construction. This record will be available <u>and shared with the relevant local authorities (and if requested, shared with other relevant stakeholders) for comparison following reinstatement after the works have been completed, to demonstrate that the standard of reinstatement meets that recorded in the pre-condition survey or as agreed in the Outline LEMP.</u></i>	
7.3	Biodiversity	9.3.1, 9.3.2, 9.4.3, 9.5.2 Reinstatement (of Woodland, Small Groups and Individual Trees; of Hedgerows; and of Grassland)	All these paragraphs include the language “will be considered” or “consideration will be made”. This remains vague and non-committal. As previously discussed, altering language to show intent to maximise positive outcome should be used. E.g 9.3.1 (bullet point 5): “ecological enhancements will be made wherever possible.....” and 9.5.2 “green hay will be used where available.....” etc.
7.4	Biodiversity	9.3.9 <i>“Natural regeneration of woodland post construction is proposed for woodlands where existing third-party infrastructure is being removed from woodlands and where works are minimal such as the proposed drainage works. Removal of third-party assets is considered a long-</i>	The language “where deemed necessary” should be qualified, by whom. In this case, the ECoW should be the person who deems supplementary planting necessary or not, and this should be stated for clarity.

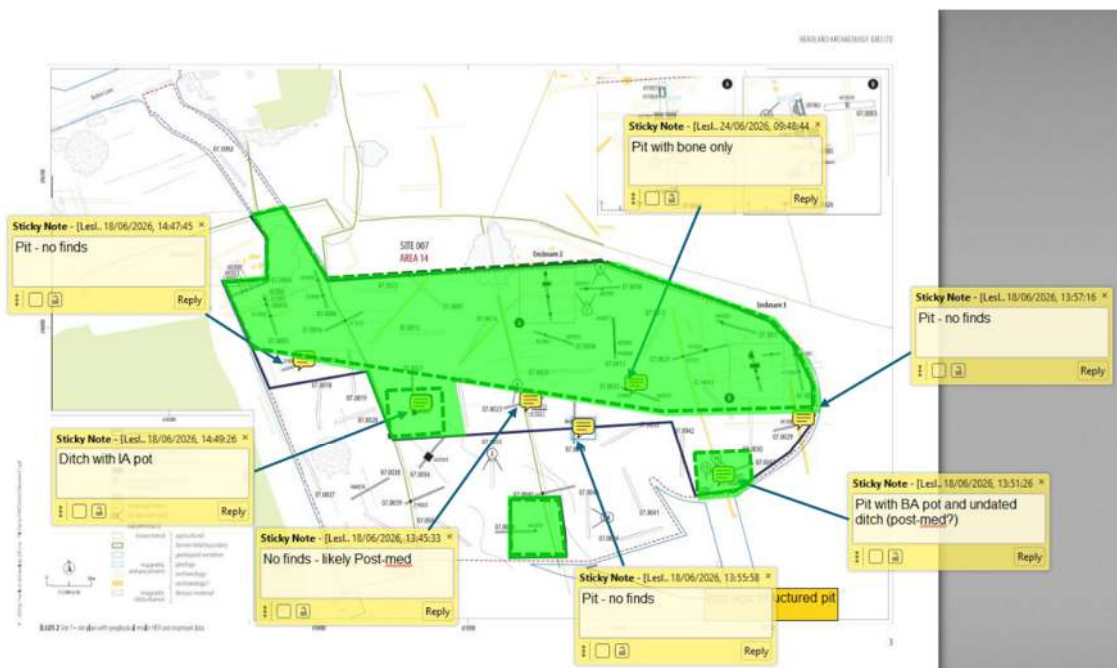
		<i>term ecological benefit, as the woodland would have been subject to an existing vegetation management regime under the existing overhead lines. Natural regeneration will allow the woodland to regenerate based on existing seed bank within the soil. Where deemed necessary, supplementary planting of saplings will be added to the woodland, which will involve tree species present with the retained woodland habitat. Supplementary planting will be subject to the same five year aftercare period as reinstatement planting, as detailed in Section 10.”</i>	
7.5	Landscape	10.1.2 <i>“The proposed aftercare measures will be adaptive to reflect the results of the ongoing monitoring of new tree/hedgerow planting. This may include the use of alternative native tree/hedgerow species, should it be found during the monitoring period that a significant number of the original tree/hedgerow species used have failed and are therefore</i>	SCC maintains that the adaptive aftercare regime must also include a temporal element to ensure that successfully established planting schemes are handed to the landowner.

		<i>considered unsuitable for the particular location. This will be determined by the Landscape Clerk of Works (LCoW)."</i>	
7.6	Landscape	10.1.3 <i>"The Applicant commits to sharing annual monitoring information relating to the establishment of planting undertaken as part of the Project with the relevant Local Planning Authorities. Reporting will be proportionate and at a level sufficient to demonstrate planting progress and identify any significant issues requiring management intervention."</i>	While SCC welcomes the commitment that annual monitoring information will be shared, it considers that site inspections should also be accommodated, either for representatives of the relevant local authorities or the Ecology and Landscape Working Group (" ELWG ").
7.7	Biodiversity/Landscape	11.2 Ecology and Landscape Working Group	Direct reference to ECoW being included within the ELWG is made. Given the recent inclusion of Landscape into the group, should the LCoW not also be included in this group and report accordingly?
7.8	Biodiversity	11.2.1 <i>"An Ecology and Landscape Working Group will be formed post-DCO consent to provide a long-term interactive and sustainable vehicle for discussing biodiversity and landscape matters to meet the</i>	Clarification that ELWG will be established post DCO but prior to pre-commencement works and in time that the ECoW can be appointed and in position prior to pre-commencement works as they will be responsible for advising on and supervising these activities.

		<i>requirements of the Norwich to Tilbury Project. The Ecology and Landscape Working Group will ensure continued communication regarding biodiversity and landscape matters between the Project team and relevant stakeholders and discuss progress of biodiversity and landscape mitigation and enhancement as laid out in the DCO.”</i>	
7.9	Landscape	Appendix D – Outline Landscape Proposals (Clean) (Final Issue D) [REP7-350]	SCC welcomes that this version now includes all sites, where the Applicant proposes landscaping (not including the potential areas for compensation measures). SCC welcomes the amendments that have been made to the Wenham Grove CSE Compound Landscape Proposals (12055-LUC-XX-XX-DR-L-0006, Revision B, July 2026) and considers that these provide an acceptable outline design for this CSE compound site, as the basis for the detailed design.

Table 8: 7.5 9 (C) Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP7-353]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
8.1	Archaeology	5.3.44	The standard approach in Suffolk is to define a mitigation area by extending it to the nearest blank trial trench, unless otherwise agreed with SCCAS. This is because the 4% trial trenching sample identifies archaeological significance and potential but does not provide sufficient detail to establish the precise extent of archaeological heritage assets.
8.2	Archaeology	Appendix B Archaeological Mitigation Areas	Should be retitled as “<u>Indicative Archaeological Mitigation Areas and Indicative Phase 2 Trial Trenching</u>” The mitigation areas identified in Appendix B only relate to the priority areas that have been fully evaluated pre-consent. It must be made clear that phase 2 trial trenching and any further trial trenching of areas of impact post-consent has not been completed, and further archaeological mitigation will be informed by the results of this programme of further evaluation.
8.3	Archaeology	Figure 1 (Suffolk Sections B and C)	The title of the figure “<i>Progress of Priority geophysical survey, Priority archaeological trial trenching and Phase 2 geophysical survey and areas for Phase 2 archaeological trial trenching</i>” should be amended as follows: “<i>Progress of Priority geophysical survey, Priority archaeological trial trenching and Phase 2 geophysical survey and <u>indicative</u> areas for Phase 2 archaeological trial trenching</i>” SCCAS believe that all permanent accesses, SuDs ponds, 3rd party undergrounding of 132kV and 33kV should be depicted on the plan as requiring further archaeological assessment, evaluation and potential archaeological mitigation. Because these aspects of the scheme have the potential to seriously impact buried archaeological remains. Pulling areas should be highlighted as areas of potential construction impact to be informed by final design.

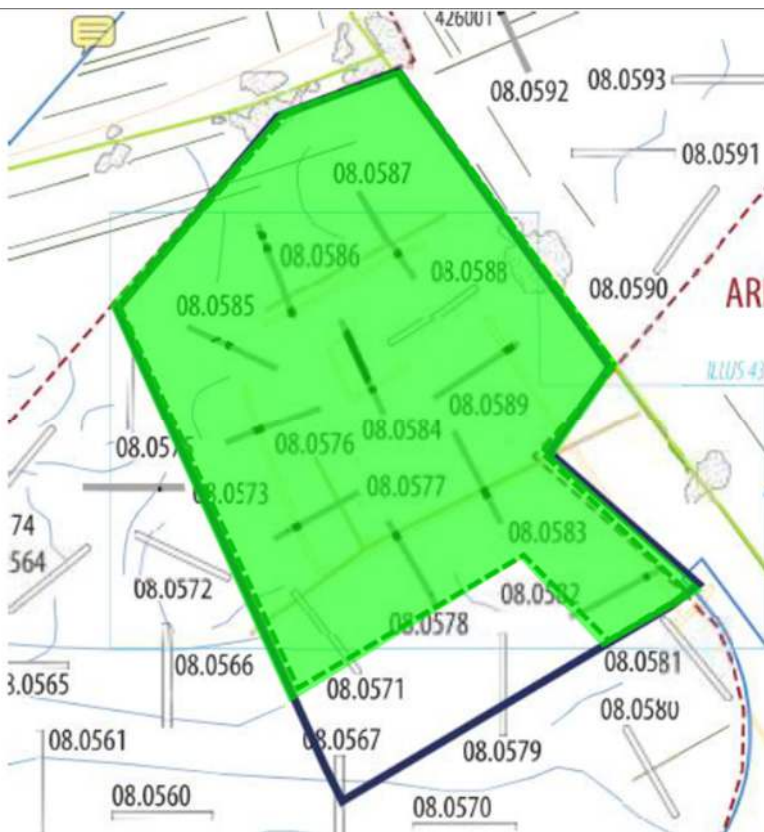
8.4	Archaeology	Figure 2 (Suffolk Sections B and C)	The proposed priority area mitigation areas should reflect the priority area mitigation areas recommended by SCCAS in an email to the Applicant on 24 July 2026, see below: NB. Phase 2 trial trenching and any further trial trenching of areas of impact post-consent has not been completed, and further archaeological mitigation will be informed by the results of this programme of further evaluation.
8.5	Archaeology	Mitigation areas Site 007	There is very little separation between the proposed targeted mitigation area around the ditch containing Iron Age pottery and the larger mitigation area. SCCAS therefore recommends that the two areas are combined, as shown in green on the plan below. This would make the stripping strategy more straightforward and reduce the likelihood that extensions will be required during the fieldwork.

SCCAS has not suggested that the medieval and prehistoric remains are directly or indirectly related. However, archaeological sites are frequently multiperiod, with activity of different dates occurring within the same geographical area. The mitigation area should therefore reflect the multiperiod character of the archaeological remains identified at Site 007 rather than being defined by reference to a single period.

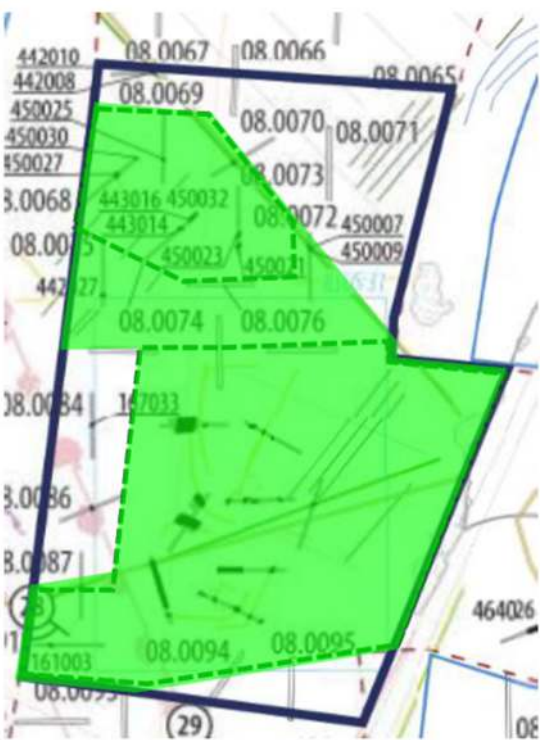
SCCAS accept that, based on the results of the trial trenching, the post-medieval ditches in this area are of limited research potential. However, these ditches are not the focus of the proposed mitigation. Rather, the mitigation area is intended to address the potential for prehistoric

			activity to extend beyond the trenches in which it was identified. This is particularly relevant given the often dispersed and ephemeral nature of prehistoric archaeology in Suffolk. Defining smaller, targeted mitigation areas would increase the likelihood that extensions will be required during the fieldwork. A larger, continuous mitigation area would reduce this risk and provide a more effective means of establishing the extent and character of the prehistoric activity. SCCAS are willing to agree to the above proposed mitigation areas, if there can be guarantees that there is provision in the OAMS-OWSI and DWSI for extensions if required in the field.
8.6	Archaeology	Mitigation Area site 008 area 17	SCCAS are willing to agree to the slight reduction of the proposed mitigation area, however, there will need to be provision for extensions should significant archaeology be indicated to extend beyond the defined mitigation area and/or if the design changes to create impacts beyond that area.

			
8.7	Archaeology	Mitigation Area site 008 area 21	The area to be avoided will need to be included in a preservation in situ management plan, which can be incorporated into the DWSI for this area.

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8.9	Archaeology	Mitigation area 102 c and d (site 008 area15S)	 Ditch 442027 in trench 08.0075 contained small find SF44202 and an assemblage of animal bone. Although the iron knife could not be dated, the date range for it would be from the Iron Age to the medieval period most likely. Therefore, this trench and surrounding area should be included in the mitigation area. SCCAS do not agree that the two mitigation areas should be separated. Although the trial trenching had blank trenches between the medieval and prehistoric/Roman features, the evaluation results do not provide sufficient confidence to demonstrate that the intervening area between the two identified concentrations is archaeologically sterile.
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			SCCAS acknowledge the Applicant’s point regarding the blank trenches to the north-east and are willing to accept the reduction to the proposed mitigation area here.
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Table 9: 8.4.16 (A) Applicant's Comments on any Further Information or Submissions Received by Deadline 6 [REP7-481]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
9.1	Highways	Table G.4 (4.2) <i>"7.3 Outline Construction Traffic Management Plan [REP6-082] includes details on the limited activities which may require the use of non-PARs. The routing from the SRN and MRN of construction vehicles associated with these activities has not been confirmed at this stage of the project development. The Main Works Contractor(s) have committed to a three month lookahead, and the delivery routes and timings would be communicated by the Main Works Contractor(s) to all companies and/or drivers involved in the transport of materials and plant to and from site by HGV construction vehicles. The three-month lookahead will be shared with Suffolk County Council, as the relevant highway authority. The Applicant and Main Works Contractor(s) will continue to discuss these arrangements with Suffolk County Council during the development of the final CTMP post-DCO."</i>	The Local Highway Authority ("LHA") does not feel the response from the Applicant at Deadline 7 ("D7") is adequate. Non-primary access routes should be secured within the DCO to ensure that these are adhered to during construction, in order to help mitigate the effects on local communities. Without doing so, the selection of these routes at a latter state will not be visible in planning terms to those communities.
9.2	Highways	Table G.4 (4.7) <i>"Section 6.4.1 of 7.3 Outline Construction Traffic Management Plan [REP6-082] lists "Construction HGV movements above those included within the</i>	The LHA made comments at D7 questioning how exceedances in Heavy Goods Vehicle ("HGV") numbers can be predicted in the 3 months look ahead. This implies that there is a lack of confidence from the Applicant about the HGV numbers estimated in their own

		<i>Transport Statement (document reference 7.11) and the Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects (document reference 6.16.A4) to be reported within the three month look ahead" as a matter of non-compliance. Section 5.4.20 of 7.3 Outline Construction Traffic Management Plan [REP6-082] provides additional detail on the three-month look ahead. Where the three-month lookahead identifies any predicted exceedances above those documented in the Transport Statement and Environmental Statement, and National Grid's EnvCoW considers that these would have the potential to introduce materially new, or materially different, residual effects, the Main Works Contractor(s) will discuss with National Grid, the relevant Local Highway Authority, and National Highways where appropriate, suitable steps to avoid or mitigate such effects."</i>	Transport Statement [REP7-357] and the Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [REP7-310]. SCC notes that without the Applicant accepting caps in terms of HGVs, there is no control mechanism to ensure the realistic worse case assumed by the Applicant when assessing potential impacts will not be exceeded. The matter of caps on HGVs is NOT AGREED.
9.3	Highways	Table G.5 (5.1) <i>"The 7.3 Outline Construction Traffic Management Plan Appendix B: Construction Worker Travel Plan [REP5-151] was updated to reflect the assumptions used within the trip generation for construction worker trips. The target for construction workers (OHL and Cables and Substation) is noted as two per vehicle, as this reflects the trip generation assumption. Admin workers are assumed to arrive</i>	SCC as the LHA does not feel the comments made on the change to the car share ratio have been adequately addressed. The LHA has yet to see any data supporting the new car share ratio target of 2. If the Applicant is committed to this target, the LHA would like to know how this will be enforced and what action will be taken for any non-compliance.

		<i>in vehicles alone (vehicle occupancy of one) and therefore this has not been added as a target to the CWTP, due to vehicles inherently having a minimum occupancy of 1. These targets have been developed based on the assumptions used within the trip generation, and previous assumptions used in energy projects developed by the technical teams. The Applicant commits to providing monitoring reports on the car occupancy for staff vehicles arriving to site, and this information will be shared with Suffolk as the relevant highway authority on a quarterly basis.”</i>	
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Table 10: 8.13 (B) Outline Employment and Skills Plan [REP7-490]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
10.1	Skills, education and employment	Workforce demand, skills Requirements and evidence base	SCC welcomes the additional labour market information, workforce projections, policy context and skills evidence incorporated within the revised OESP, particularly within Sections 2, 3, 4 and 5. SCC also welcomes the inclusion of indicative workforce numbers and broad descriptions of employment opportunities associated with the Project. However, SCC remains concerned that the OESP is not underpinned by the workforce evidence necessary to understand the scale, timing and nature of labour demand arising from the Project. Whilst the OESP identifies approximately 4,800 construction jobs and a peak workforce of approximately 1,720 FTE employees (paragraph 2.3.2) and acknowledges that workforce demand will vary over the construction programme (paragraphs 2.1.1 and 2.3.4), it does not provide the detailed workforce modelling envisaged by SCC's supplementary guidance. In particular, the OESP does not identify workforce requirements by distinct construction phase, occupation, qualification level, skillset, duration or construction activity, instead confirming that detailed workforce profiling will be undertaken post-consent and reported through the Final ESP (paragraphs 1.1.3, 2.1.1, 6.4.2 and 7.2.2). SCC also remains concerned that the OESP does not identify the anticipated geography from which different elements of the workforce will be drawn. Whilst paragraph 2.3.3 assumes that a minimum of 10% of the workforce may be sourced locally, no evidence is provided regarding likely labour draw areas, the balance between local, regional and national recruitment, or the distinction between skilled and non-skilled labour sources. Similarly, the basis upon

			which the 10% assumption has been derived is not explained. SCC's adopted methodology expects project promoters to define the geography of labour supply and assess workforce origins by work phase in order to understand local employment opportunities and wider socio-economic implications. The OESP also does not distinguish adequately between civil construction and mechanical and electrical workforce requirements. Whilst paragraphs 4.4.4 and 6.2.1 acknowledge the need for specialist electrical, engineering and transmission-related skills, the document does not quantify these requirements or identify the extent to which they differ from broader construction labour demand. SCC's guidance identifies this distinction as important in understanding long-term skills development opportunities and energy-sector legacy benefits. More fundamentally, SCC's concern is not the absence of workforce data in isolation, but that without a robust understanding of workforce demand it is not possible to fully understand either the opportunities arising from the Project or the potential socio-economic effects associated with that demand. This includes understanding skills shortages, labour displacement risks, pressure on local labour markets, workforce availability and the scale of intervention required to maximise local participation. SCC's supplementary guidance is clear that baseline information should support an assessment of impacts and opportunities.
10.2	Skills, education and employment	Cumulative labour market impacts and regional coordination	SCC welcomes the Applicant's acknowledgement of the significant number of NSIPs and major infrastructure projects progressing across Norfolk, Suffolk and Essex (Section 4.7), together with the expanded recognition of the Regional Skills Coordination Function (“RSCF”) and wider regional skills infrastructure (paragraphs 4.2.2, 4.2.3, 5.3.4, 5.3.7 and 5.3.8). SCC also welcomes the

			commitment to share workforce and supply chain information with the RSCF and equivalent regional organisations (paragraphs 6.4.1 to 6.4.3). However, SCC remains concerned that cumulative labour market impacts have not been adequately assessed. Whilst the OESP acknowledges that multiple infrastructure projects may create cumulative skills and workforce pressures (paragraphs 4.7.1 to 4.7.5), it does not provide a quantified assessment of overlapping workforce demand, phase-specific labour market competition, labour displacement risks, wage inflation pressures, competition for specialist occupations or cumulative impacts on the availability of labour and skills across the region. Paragraph 4.7.5 states that communication with other NSIPs will be undertaken where necessary, but this is not a substitute for a cumulative labour market assessment. SCC also notes that the OESP does not apply the low, medium and high workforce opportunity scenarios envisaged by SCC's supplementary guidance, nor does it assess how different workforce assumptions may influence cumulative effects or local participation rates. As a result, the evidence base does not provide sufficient confidence regarding the likely scale of workforce impacts under different delivery scenarios. Whilst SCC welcomes the significantly expanded references to the RSCF, engagement continues to be framed primarily as a mechanism for sharing workforce information and aligning training activity (paragraphs 6.4.1 to 6.4.3). SCC's position remains that the RSCF is the established governance framework through which workforce demand, skills provision, cumulative infrastructure pressures and regional workforce planning should be coordinated and managed. Although the OESP commits to engagement, it does not demonstrate how workforce forecasting, intervention planning, governance, monitoring and coordination with other infrastructure projects
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			will operate through the RSCF in practice, nor does it establish the agreed governance arrangements envisaged by SCC policy.
10.3	Skills, education and employment	Skills, education and workforce development	SCC welcomes the broad range of skills, employment and education initiatives identified within Section 6.2, including apprenticeships, STEM engagement, skills bootcamps, careers activities, workforce diversity initiatives, volunteering programmes and engagement with education providers. SCC also welcomes the greater recognition given to local and regional skills infrastructure, including LSIPs, colleges, training providers and skills partnerships (Sections 4.2 and 6.2). However, the majority of interventions remain high-level and activity-focused. Whilst the OESP identifies a range of programmes and initiatives (paragraphs 6.2.3 to 6.2.31), it does not clearly demonstrate how the specific workforce requirements of the Project have informed the proposed interventions or how the scale of activity relates to forecast workforce demand, occupational shortages or identified skills gaps. Key workforce information required to establish this relationship continues to be deferred to the Final ESP (paragraphs 6.1.3, 6.5.1 and 7.2.2). SCC also notes that, whilst the OESP identifies a wide range of education and training providers across Norfolk, Suffolk and Essex (paragraphs 4.2.4 to 4.2.6), it does not assess the capacity of the education, skills and training system to meet forecast project demand, either alone or in combination with other major infrastructure projects. SCC's supplementary guidance expects project promoters to assess education and training infrastructure and its ability to supply, or expand to supply, the skills required by the Project. This assessment is not provided within the OESP.

10.4	Skills, education and employment	Supply chain opportunities and capacity	SCC welcomes the additional discussion relating to local business engagement, Chamber of Commerce partnerships, Meet the Buyer events and support for SMEs contained within Sections 4.5 and 6.3. SCC also acknowledges the Applicant's commitment to work with existing supply chain networks and to maximise opportunities for local suppliers where possible (paragraphs 4.2.7, 6.3.3, 6.3.4 and 6.3.5). However, SCC remains concerned that the OESP does not provide the evidence base expected by SCC's supplementary guidance in relation to supply chain opportunities and impacts. Whilst paragraphs 2.5.1, 2.7.1 and 4.5.1 to 4.5.5 identify broad categories of goods, services and sectors relevant to the Project, the OESP does not include a phase-specific assessment of supply chain requirements, analysis of local and regional business capacity, assessment of likely participation rates or consideration of cumulative demand pressures arising from other infrastructure projects. Similarly, although paragraph 4.5 concludes that the Study Area has established supply chain strengths and paragraph 6.3 identifies proposed engagement activities, the document does not apply the scenario-based methodology set out in SCC's guidance or assess the likelihood of hyper-local, local or regional businesses securing Project opportunities. As a result, SCC remains concerned that the scale, timing and nature of supply chain opportunities and cumulative supply chain pressures have not been fully evidenced.
10.5	Skills, education and employment	Governance, monitoring and delivery	SCC welcomes the amendment to Requirement 15 and the confirmation that the Final ESP will require approval by the relevant county and unitary authorities prior to commencement of development (paragraphs 1.1.4, Executive Summary and 7.2.2). This addresses one of SCC's previous concerns regarding governance and oversight of the Final ESP.

		However, key implementation, monitoring and delivery information continues to be deferred to the Final ESP. Paragraphs 6.5.1, 7.2.2 and 7.3.3 confirm that workforce profiling, responsibilities, monitoring arrangements, delivery mechanisms and performance reporting will be developed post-consent. The OESP itself contains limited measurable outcomes and does not establish defined targets relating to local employment, apprenticeships, training provision, workforce diversity, supply chain participation or wider socio-economic outcomes. Consequently, SCC remains concerned that the framework lacks sufficient certainty regarding delivery, accountability and the measurement of success. SCC is also concerned that the Executive Summary and paragraph 1.1.4 state that the Final ESP will be substantially in accordance with the OESP and will not be used to introduce additional commitments, requirements, targets or subject matter beyond those already contained within the OESP. Given that key workforce, skills, supply chain and delivery information continues to be deferred to the Final ESP, SCC considers it particularly important that the OESP itself contains a sufficiently robust evidence base, delivery framework and measurable outcomes.
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Table 11: 8.18 (B) Detailed Written Scheme of Investigation - Mitigation areas 102 (a, b, c & d) & 146 [REP7-501]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
11.1	Archaeology	<i>"5.4.3 In accordance with sections 5.3.108-5.3.119 of the AMS-OWSI, in the event that human remains are encountered:</i> <i>• Works will stop in the affected area.</i> <i>• The ACoW and The Client will be notified immediately. The ACoW will notify SCCAS and relevant authorities in order to agree an excavation strategy. Human remains will need to be fully excavated and recorded in accordance with Historic England (Ref 20) and ClfA (Ref 7) guidance. The treatment, excavation and removal of human remains will be undertaken in accordance with Article 23 of the draft Development Consent Order, which sets out the relevant</i>	Article 23 as currently drafted sets out a statutory mechanism for the proposed lawful removal of human remains impacted by the development. It does not provide the relevant provisions for the removal of human remains from archaeological contexts or provide an archaeological methodology for the excavation, recording, analysis, storage, archiving for future study or reburial of archaeological human remains. Those matters must be secured and detailed in the OAMS-OWSI and DWSI. SCCAS would advise that reference to Article 23 is removed from the DWSI, and instead it is changed to "<u>all relevant legal requirements</u>" as it has been stated in the OAMS-OWSI. SCCAS would advise the following amendment to paragraph 5.4.3: <i>5.4.3 In accordance with sections 5.3.108-5.3.119 of the OAMS-OWSI, in the event that human remains are encountered:</i> <i>• Works will stop in the affected area.</i> <i>• The ACoW and The Client will be notified immediately. The ACoW will notify SCCAS and relevant authorities in order to agree an excavation strategy. Human remains will need to be fully excavated and recorded in accordance with Historic England (Ref 20*) and, ClfA (Ref 7*) and SCCAS (*) guidance. The treatment, excavation and removal, and storage of human remains will be undertaken in accordance with <u>the methodology set out within the OAMS-OWSI and this DWSI, and all relevant legal requirements.</u> Article 23 of the draft Development</i>

		<i>provisions for the removal of human remains.</i> • <i>Procedures will follow the requirements set out in Article 23 of the draft Development Consent Order, together with relevant Historic England guidance.”</i>	<i>Consent Order, which sets out the relevant provisions for the removal of human remains.</i> • Procedures The methodology will follow the requirements set out in Article 23 of the draft Development Consent Order, together with all relevant legal requirements and guidance. *Please insert the correct guidance for archaeological human remains. For archaeological human remains please include the following as relevant guidance for treatment, excavation, recording, storage and analysis: • APABE (2017), <i>Guidance for Best Practice for the Treatment of Human Remains Excavated from Christian Burial Grounds in England</i>, second edition. • APABE (2023) <i>Science and the Dead</i>, second edition. • APABE (2015) <i>Large Burial Grounds: Guidance on Sampling in Archaeological Fieldwork Projects</i>. • ClfA (2017) <i>Updated Guidelines to the Standards for Recording Human Remains</i>. • Historic England (2018) <i>The Role of the Human Osteologist in an Archaeological Fieldwork Project</i>. • SCCAS (2026) <i>Requirements for Archaeological Excavation (updated April 2026)</i>. • SCCAS (2026) <i>Excavating Inhumations for Mineral Preserved Organics Guidance (reviewed April 2026)</i>.
11.2	Archaeology	<i>Bibliography**</i>	• Ref 21 SCCAS. (2024). Archives: Guidelines for Archive Preparation and Deposition. This should be updated to 2026.

			• Please include the following guidance document reference: <u>SCCAS (2026) Requirements for Archaeological Excavation.</u> As it is mentioned in paragraph 1.4.1 • Please include the following guidance document reference: <u>SCCAS 2026 Excavating Inhumations for Mineral Preserved Organics Guidance (reviewed April 2026).</u> As it is mentioned in paragraph 5.4.3 **Please ensure that all documents referenced in the DWSI are the correct most up-to-date versions and are referenced in the bibliography.
11.3	Archaeology	Figure 1: Location of Mitigation Areas 102 (a, b, c & d) and 146	SCCAS have recommended that mitigation areas 102c and 102d be combined. SCCAS do not agree that the two mitigation areas should be separated. Although the trial trenching included blank trenches between the medieval and prehistoric/Roman features, the evaluation results have indicated an area of archaeological potential and do not provide sufficient confidence to demonstrate that the intervening area is archaeologically sterile.
11.4	Archaeology	General	<u>Once these amendments have been made the DWSI can be agreed in principle.</u>

Table 12: 8.19 (B) Detailed Written Scheme of Investigation - Mitigation areas 103a & 103b [REP7-503]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
12.1	Archaeology	<i>"5.4.3 In accordance with sections 5.3.108-5.3.119 of the AMS-OWSI, in the event that human remains are encountered:</i> <i>• Works will stop in the affected area.</i> <i>• The ACoW and The Client will be notified immediately. The ACoW will notify SCCAS and relevant authorities in order to agree an excavation strategy. Human remains will need to be fully excavated and recorded in accordance with Historic England (Ref 20) and ClfA (Ref 7) guidance. The treatment, excavation and removal of human remains will be undertaken in accordance with Article 23 of the draft Development Consent Order, which sets out the relevant</i>	Article 23 as currently drafted sets out a statutory mechanism for the proposed lawful removal of human remains impacted by the development. It does not provide the relevant provisions for the removal of human remains from archaeological contexts or provide an archaeological methodology for the excavation, recording, analysis, storage, archiving for future study or reburial of archaeological human remains. Those matters must be secured and detailed in the OAMS-OWSI and DWSI. SCCAS would advise that reference to Article 23 is removed from the DWSI, and instead it is changed to "<u>all relevant legal requirements</u>" as it has been stated in the OAMS-OWSI. SCCAS would advise the following amendment to paragraph 5.4.3: <i>5.4.3 In accordance with sections 5.3.108-5.3.119 of the OAMS-OWSI, in the event that human remains are encountered:</i> <i>• Works will stop in the affected area.</i> <i>• The ACoW and The Client will be notified immediately. The ACoW will notify SCCAS and relevant authorities in order to agree an excavation strategy. Human remains will need to be fully excavated and recorded in accordance with Historic England (Ref 20*) and, ClfA (Ref 7*) <u>and SCCAS (Ref 22, 23*)</u> guidance. The treatment, excavation and removal, <u>and storage</u> of human remains will be undertaken in accordance with <u>the methodology set out within the OAMS-OWSI and this DWSI, and all relevant legal requirements.</u> Article 23 of the draft Development</i>

		<i>provisions for the removal of human remains.</i> • <i>Procedures will follow the requirements set out in Article 23 of the draft Development Consent Order, together with relevant Historic England guidance.”</i>	<i>Consent Order, which sets out the relevant provisions for the removal of human remains.</i> • <i>Procedures The methodology will follow the requirements set out in Article 23 of the draft Development Consent Order, together with all relevant legal requirements and guidance.</i> *Please insert the correct guidance for archaeological human remains. For archaeological human remains please include the following as relevant guidance for treatment, excavation, recording, storage and analysis: • APABE (2017), <i>Guidance for Best Practice for the Treatment of Human Remains Excavated from Christian Burial Grounds in England</i>, second edition. • APABE (2023) <i>Science and the Dead</i>, second edition. • APABE (2015) <i>Large Burial Grounds: Guidance on Sampling in Archaeological Fieldwork Projects</i>. • ClfA (2017) <i>Updated Guidelines to the Standards for Recording Human Remains</i>. • Historic England (2018) <i>The Role of the Human Osteologist in an Archaeological Fieldwork Project</i>. • SCCAS (2026) <i>Requirements for Archaeological Excavation (updated April 2026)</i>. SCCAS (2026) <i>Excavating Inhumations for Mineral Preserved Organics Guidance (reviewed April 2026)</i>.1
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12.2	Archaeology	<i>Bibliography**</i>	• Ref 22 SCCAS. (2024). Archives: Guidelines for Archive Preparation and Deposition. This should be updated to 2026. • Please include the following guidance document reference: <u>SCCAS (2026) Requirements for Archaeological Excavation.</u> As it is mentioned in paragraph 1.4.1 • Please include the following guidance document reference: <u>SCCAS 2026 Excavating Inhumations for Mineral Preserved Organics Guidance (reviewed April 2026).</u> As it is mentioned in paragraph 5.4.3 **Please ensure that all documents referenced in the DWSI are the correct most up-to-date versions and are referenced in the bibliography.
12.3	Archaeology	<i>General</i>	<u>Once these amendments have been made the DWSI can be agreed in principle.</u>

Table 13: 8.20 (B) Detailed Written Scheme of Investigation - Mitigation areas 122a, 122b, 122c & 123 [REP7-505]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
13.1	Archaeology	<i>"5.4.3 In accordance with sections 5.3.108-5.3.119 of the AMS-OWSIOAMS-OWSI, in the event that human remains are encountered:</i> <i>• Works will stop in the affected area.</i> <i>• The ACoW and The Client will be notified immediately. The ACoW will notify SCCAS and relevant authorities in order to agree an excavation strategy. Human remains will need to be fully excavated and recorded in accordance with Historic England (Ref 20) and ClfA (Ref 7) guidance. The treatment, excavation and removal of human remains will be undertaken in accordance with Article 23 of the draft Development Consent Order, which sets out the relevant</i>	Article 23 as currently drafted sets out a statutory mechanism for the proposed lawful removal of human remains impacted by the development. It does not provide the relevant provisions for the removal of human remains from archaeological contexts or provide an archaeological methodology for the excavation, recording, analysis, storage, archiving for future study or reburial of archaeological human remains. Those matters must be secured and detailed in the OAMS-OWSI and DWSI. SCCAS would advise that reference to Article 23 is removed from the DWSI, and instead it is changed to "<u>all relevant legal requirements</u>" as it has been stated in the OAMS-OWSI. SCCAS would advise the following amendment to paragraph 5.4.3: <i>5.4.3 In accordance with sections 5.3.108-5.3.119 of the OAMS-OWSI, in the event that human remains are encountered:</i> <i>• Works will stop in the affected area.</i> <i>• The ACoW and The Client will be notified immediately. The ACoW will notify SCCAS and relevant authorities in order to agree an excavation strategy. Human remains will need to be fully excavated and recorded in accordance with Historic England (Ref 20*) and, ClfA (Ref 7*) and SCCAS (Ref 21*, 23*) guidance. The treatment, excavation and removal, and storage of human remains will be undertaken in accordance with <u>the methodology set out within the OAMS-OWSI and this DWSI, and all relevant legal requirements.</u> Article 23 of the</i>

		<i>provisions for the removal of human remains.</i> • <i>Procedures will follow the requirements set out in Article 23 of the draft Development Consent Order, together with relevant Historic England guidance.”</i>	<i>draft Development Consent Order, which sets out the relevant provisions for the removal of human remains.</i> • Procedures The methodology will follow the requirements set out in Article 23 of the draft Development Consent Order, together with all relevant legal requirements and guidance *Please insert the correct guidance for archaeological human remains. For archaeological human remains please include the following as relevant guidance for treatment, excavation, recording, storage and analysis: • APABE (2017), <i>Guidance for Best Practice for the Treatment of Human Remains Excavated from Christian Burial Grounds in England</i>, second edition. • APABE (2023) <i>Science and the Dead</i>, second edition. • APABE (2015) <i>Large Burial Grounds: Guidance on Sampling in Archaeological Fieldwork Projects</i>. • ClfA (2017) <i>Updated Guidelines to the Standards for Recording Human Remains</i>. • Historic England (2018) <i>The Role of the Human Osteologist in an Archaeological Fieldwork Project</i>. • SCCAS (2026) <i>Requirements for Archaeological Excavation (updated April 2026)</i>. • SCCAS (2026) <i>Excavating Inhumations for Mineral Preserved Organics Guidance (reviewed April 2026)</i>.
13.2	Archaeology	<i>Bibliography**</i>	• Ref 21 SCCAS. (2024). Archives: Guidelines for Archive Preparation and Deposition. This should be updated to 2026.

			Please include SCCAS (2026) Excavating Inhumations for Mineral Preserved Organics Guidance (reviewed April 2026) as this is referenced in 5.4.3 **Please ensure that all documents referenced in the DWSI are the correct most up-to-date versions and are referenced in the bibliography.
13.3	Archaeology	Figure 2: Mitigation areas 122 & 123 over Trial Trench Locations	SCCAS have recommended that mitigation areas 122a is slightly increased in size to incorporate area between trenches with known significant archaeological remains of interest and those without, to ensure that all significant archaeological remains are mitigated.
13.4	Archaeology	General	<u>Once these amendments have been made the DWSI can be agreed in principle.</u>

Table 14: 8.31 (A) Response to Rule 17 Letter Received 14 July 2026 [REP7-533]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
14.1	Skills, education and employment	Question 8.1 Employment and Skills Plan <i>"The Applicant respectfully does not agree that there has been a lack of focus on socio-economic matters. Socio-economic effects have been assessed within 6.15 ES Chapter Socio-Economics, Recreation and Tourism (Revision B) [REP6-070], whilst the 8.13 Outline Employment and Skills Plan [Revision B] (OESP) has been prepared to establish the framework through which employment, skills and supply chain opportunities will be delivered. Relevant socio-economic effects have therefore been considered through both the ES and the OESP, each serving distinct but complementary purposes. The Applicant does not agree that the OESP is unsupported by an appropriate evidence base. The OESP is an outline, benefit-led document which establishes the framework, governance</i>	SCC welcomes the revisions made to the OESP, including stronger recognition of the Regional Skills Coordination Function ("RSCF"), additional references to regional skills infrastructure, and the amendment to Requirement 15 requiring approval of the Final Employment and Skills Plan ("ESP") by the relevant county and unitary authorities prior to commencement of development. SCC also welcomes the Applicant's commitment to engage with the RSCF and regional stakeholders in the development of the Final ESP. However, SCC does not agree that its concerns have been adequately addressed, nor that the OESP is supported by a sufficient evidence base. SCC's concern is not the principle of an Employment and Skills Plan, but the continued absence of the workforce, skills and supply chain evidence necessary to understand the scale, timing and nature of labour demand arising from the Project and how that demand will interact with existing labour market conditions and other major infrastructure projects across the region. The revised OESP still lacks phase-specific workforce modelling, occupational and skills demand forecasts, workforce origin analysis, labour draw assumptions, supply chain capacity assessment and a quantified assessment of cumulative labour market pressures, with much of this information continuing to be deferred to the post-consent Final ESP. This limits the ability to understand both the opportunities arising from the Project and the potential adverse socio-economic effects associated with labour demand, including cumulative labour market pressures, workforce

	<i>arrangements and commitments that will guide the development of the Final ESP. It is not intended to provide a detailed assessment of workforce, labour market or supply chain effects. Socio-economic effects are assessed separately within 6.15 ES Chapter Socio-Economics, Recreation and Tourism (Revision B) [REP6-070]. The level of detail provided in the OESP is proportionate to the current stage of the Project. The Applicant also notes that workforce demand should be considered in the context of the scale and nature of the Project which is linear, resulting in a more dispersed workforce than would be expected with a single site project. Whilst Norwich to Tilbury represents a significant infrastructure investment, its peak construction workforce is also substantially lower than that associated with major projects such as Sizewell C. Many of the jobs created will be of a specialised nature with general civils construction skills likely to be the predominant area of overlap with other NSIPs. The Applicant is</i>	displacement risks, constraints within the regional skills system and the scale of interventions required to maximise local participation and long-term skills outcomes. SCC considers these matters fundamental to understanding workforce impacts and planning effective workforce, skills and education interventions, consistent with SCC's Energy and Climate Adaptive Infrastructure Policy and supporting socio-economic guidance. SCC also disagrees that cumulative workforce and supply chain pressures have been appropriately considered. Whilst the Applicant refers to workforce planning through the Great Grid Partnership and wider ASTI programme, these arrangements support internal resource planning rather than constituting a cumulative labour market assessment. The evidence does not assess overlapping workforce demand with other NSIPs, phase-specific labour market competition, competition for specialist occupations, labour displacement risks, wage inflation pressures, the capacity of existing skills pipelines to respond to concurrent demand or wider cumulative effects on the availability of labour and skills across Suffolk and the wider region. Similarly, the Applicant's confidence in the capacity of the civil engineering supply chain is not supported by a corresponding evidence base. The OESP does not provide a detailed assessment of likely supply chain requirements by project phase, local and regional business capacity, cumulative demand pressures, the probability of local participation, or potential constraints across key sectors and specialisms. SCC therefore remains concerned that the scale and nature of supply chain opportunities and pressures have not been fully understood or evidenced. Whilst SCC welcomes the enhanced references to the RSCF, the OESP continues to present engagement with the RSCF principally as a mechanism for information sharing. SCC's position remains that the RSCF is the established regional coordination mechanism through which workforce
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		<i>confident in the capacity of the civils supply chain. [...]"</i>	demand, skills provision, infrastructure planning and cumulative project pressures should be aligned and managed. The Applicant has not demonstrated how workforce demand arising from the Project will be integrated with existing regional workforce planning processes, coordinated alongside other major infrastructure projects or how workforce forecasting, intervention planning, governance, monitoring and regional coordination will operate through this framework in practice. SCC welcomes the amendment to Requirement 15, which addresses one of its previous concerns regarding governance of the Final ESP. However, the OESP itself continues to contain limited measurable outcomes against which success can be assessed. Defined targets relating to local employment, apprenticeships, training delivery, workforce outcomes, supply chain participation and monitoring arrangements remain absent, limiting certainty regarding delivery, accountability and long-term outcomes.
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Table 15: 8.35 (A) Landscape compensation, offsetting and enhancement area plans [REP7-535]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
15.1	Archaeology	General	SCC Archaeological Service support the proposal for Landscape compensation, offsetting and enhancement. However, archaeology should be a material consideration when selecting sites for landscape compensation, offsetting and enhancement. Archaeological work undertaken to date for this project has identified areas of high archaeological potential. In addition, the Suffolk County Historic Environment Record (“HER”) contains evidence demonstrating archaeological potential across all areas within the identified parishes. The historic environment (archaeology both designated and non-designated) of full parishes identified in this document were not considered in the 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [REP6-061]. Landscape enhancement methods, including wetland creation, ponds, river enhancement, tree planting, soil inversion for grassland creation, and heathland creation, etc., have the potential to cause significant adverse impacts to buried archaeological remains. Archaeological potential should therefore be assessed and taken into account when selecting sites and determining appropriate enhancement measures. There should be sufficient funding available to secure the archaeological evaluation and mitigation of sites where appropriate.

Table 16: Suffolk County Council - Any further information requested by the ExA under Rule 17 of The Infrastructure Planning (Examination Procedure) Rules 2010 [REP7-572]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
16.1	Highways and Compulsory Acquisition	Question 2.7 Compulsory acquisition of operational highway Notwithstanding your reply to question 1.7 above, please confirm if the applicants submitted PPs, (or other mechanisms secured in the draft DCO) ensure that if compulsory acquisition powers are approved the highway authority will be able to ensure operation of the public highway.	Further to the comments made by SCC at Deadline 7, please find the below: The Protective Provisions for the Highways Authorities in Part 4 of schedule is silent with regarding protection of the LHAs when the applicant compulsorily acquires land within the public highway. The powers in Article 15 to stop up streets only applies to those listed in schedule 7.